

REMARKS

Claims 1-15 remain in the present application. Claims 1 and 12 were amended in this response. No new matter has been introduced as a result of the amendments.

Claim 8 was objected to for informalities. Applicants submit that the previous labeling of Claim 8 was a typographical error, and the proper listing of Claim 8 is provided in this response. Withdrawal of the objection is earnestly requested.

Claims 1-5, 7 and 9-14 were rejected under 35 U.S.C. §102(e) as being anticipated by *Bhatia et al.* (U.S. Patent No. 6,118,768). Claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Bhatia et al.* (U.S. Patent No. 6,118,768) in view of *Guerin et al.* (6,243,754). Claim 8 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Bhatia et al.* (U.S. Patent No. 6,118,768). For the following reasons, Applicants respectfully traverse the Examiner's rejection and respectfully request the withdrawal thereof.

Specifically, the cited art, alone or in combination does not teach or suggest "selecting one of the conversion devices by said device, via a selection unit implemented in the router device, using information transferred by the device, wherein the information identifies the selected one of the conversion devices; and setting up a communications link to the select conversion device via the communications network." as recited in claim 1 and similarly recited in claim 12. Under the recited claims, as an example, a workstation behind a router or modem can choose an ISP (i.e., conversion device), without relying on a router's decision of which ISP is to be selected. Under the configuration of *Bhatia* however, all workstation are beholden to the router (col. 5, line 66 – col. 6, line 7). *Bhatia* is also silent on how the databases are implemented to accommodate user-defined ISPs. Under *Bhatia*, a network service provider is selected on the basis of the origin address and the target address of a data packet received by a transmitting device (col. 30, lines 38-46). Accordingly, a network service provider is firmly prescribed in the LAN modem with respect to the devices that are connected to the aforementioned Ethernet, and a variable, situation-dependent selection of a network service provider is not feasible.

Also, the Office Action asserted that *Bhatia* discloses the ability to set up a LAN wherein a plurality of arbitrary devices are connected to the LAN having the ability to provide information to a router pertaining to information that identifies certain conversion devices (col. 5, line 61 – col. 6, line 48). However, the teaching of the cited passage only discloses the

modem's initialization for local name-to-address resolution (also referred to as Network Address Translation), which has nothing to do with selecting an ISP by providing information to identify an ISP.

For a selection of a particular network service provider, corresponding bits of information are deposited in the LAN modem for each network service provider (see, for example, Col. 5, line 61 through Col. 6, line 8 of the *Bhatia* reference). Applicants respectfully submit, however, that such selection of conversion device does not occur based on information which is transmitted to the associated router device, wherein the information identifies the selected conversion device. Conversely, Thus, Applicants respectfully submit that the *Bhatia* reference does not teach or suggest, nor even contemplate, the claimed invention wherein information may be transmitted to the router device by an arbitrary device connected to the local computer network, with the information identifying the selected one of the conversion devices.

In light of the above, Applicants respectfully submit that independent claims 1 and 12 of the present application, as well as claims 2-11 and 13-15 which respectfully depend therefrom, are both novel and non-obvious over the art of record. Accordingly, Applicants respectfully request that a timely Notice of Allowance be issued in this case.

It is further noted that no fees are due with this response at this time. However, if any fees are due in connection with this application as a whole, the Examiner is authorized to deduct said fees from Deposit Account No.: 02-1818. If such a deduction is made, please indicate the attorney docket number (0112740-350) on the account statement.

Respectfully submitted,

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